



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 31, 2023

**BY ECF**

Honorable Nina R. Morrison  
United States District Judge  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States of America v. Rare Breed Triggers, LLC, et al.*,  
No. 23-CV-369 (Morrison, J.) (Levy, M.J.)

Dear Judge Morrison:

The parties jointly respectfully request the Court's endorsement of the below proposed schedule in advance of the August 1, 2023 Preliminary Injunction Hearing.

	<b>Deadline</b>
Defendants' motion to quash outstanding subpoenas (if any) shall be filed by:	June 9, 2023
Defendants' sur-reply shall be filed by:	June 16, 2023
The United States' opposition to Defendants' motion to quash outstanding subpoenas (if any) shall be filed by:	June 16, 2023
All expert disclosures pursuant to the Federal Rules of Civil Procedure, including any expert reports or supplemental expert reports, shall be exchanged by the Parties by:	June 30, 2023
Proposed Witness Lists shall be exchanged by the Parties by:	July 7, 2023
Proposed Exhibit Lists shall be exchanged by the Parties by:	July 14, 2023
All Depositions shall be completed by:	July 14, 2023
The Parties' respective Witness Lists—containing a brief narrative statement of the expected testimony, the bases for any objection, and the response to that objection—shall be filed by:	July 17, 2023
The Parties' respective Exhibit Lists—containing a description of each exhibit, the bases for any objection, and the response to	July 17, 2023

that objection— for the Preliminary Injunction Hearing shall be filed by:	
The Parties’ respective Motions <i>in Limine</i> in advance of the Preliminary Injunction Hearing (if any) shall be filed by:	July 18, 2023
The Parties’ respective Oppositions to Motions <i>In Limine</i> (if any) in advance of the Preliminary Injunction hearing shall be filed by:	July 25, 2023
Deposition designations, affidavits, and/or stipulations of proposed facts (if any) shall be filed by:	July 25, 2023

The United States thanks the Court for its consideration of this matter.

Respectfully submitted,

BREON PEACE  
United States Attorney

/s/  
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cc: All Counsel of Record (By ECF)